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Attorneys for Defendants  
WeWoreWhat LLC, Onia, LLC Danielle  
Bernstein, Saks Fifth Avenue, Inc., and  
Carbon 38, Inc.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CV COLLECTION LLC, a New York limited liability company, d/b/a The Great Eros,

**Plaintiff.**

vs.

WE WORE WHAT, LLC, et al.,

## Defendants.

| Case No. 2:20-cv-10290-RGK-AS

**DECLARATION OF CHRISTINA  
GOODRICH IN SUPPORT OF  
STIPULATION AND REQUEST FOR  
AN ORDER TO CONTINUE  
HEARING ON DEFENDANTS  
WEWOREWWHAT LLC, ONIA, LLC,  
AND DANIELLE BERNSTEIN'S  
MOTION TO DISMISS, STAY, OR  
TRANSFER**

[Assigned to the Honorable R. Gary Klausner]

Current Hearing Date: March 1, 2021  
New Hearing Date: March 15, 2021

1                   **DECLARATION OF CHRISTINA N. GOODRICH**

2 I, Christina N. Goodrich, declare as follows:

3         1. I am an attorney duly authorized to practice law before the courts of the  
4 State of California and this Court. I am a partner with the law firm of K&L Gates  
5 LLP (“K&L Gates” or the “Firm”), attorneys for Defendants WeWoreWhat LLC,  
6 Onia, LLC, Danielle Bernstein, Saks Fifth Avenue, and Carbon 28, Inc. in the above-  
7 captioned matter. I am familiar with the file in this matter, including the filings,  
8 discovery, correspondence, and evidence, all of which are maintained in the Firm’s  
9 records in the ordinary course of business. I have personal knowledge of the facts set  
10 forth herein and could and would testify competently thereto if called upon to do so.

11         2. Good cause exists to continue the hearing on Defendants WeWoreWhat  
12 LLC, Onia, LLC, and Danielle Bernstein’s (collectively, “Defendants”) Motion to  
13 Dismiss, Stay, or Transfer, including because such a continuance is likely to moot  
14 such Motion, thereby rendering a ruling on the Motion unnecessary and conserving  
15 this Court’s resources.

16         3. As set forth in the Motion, there is a currently pending action in the  
17 Southern District of New York, captioned as *WeWoreWhat, LLC and Onia, LLC v.*  
18 *CV Collection, LLC d/b/a The Great Eros*, Case No. 1:20-cv-08623. Defendants’  
19 Motion sought to transfer or stay this Action based upon the existence of that action.

20         4. The Parties in this Action have now engaged in discussions regarding a  
21 potential agreement to transfer this Action. If the Parties reach such an agreement,  
22 Defendants’ Motion will be moot, and this Court will not be required to rule on it.

23         5. In the interest of conservation of judicial resources, therefore, the Parties  
24 believe a continuance of the Hearing on Defendants’ Motion is appropriate.

25         6. The Parties have also agreed that Defendants’ deadline to file a Reply  
26 Brief should be continued and set based on the new requested hearing date of March  
27 15, 2021.

28         ///

7. The Parties have not sought, nor has the Court entered, any prior continuance related to Defendants' Motion.

Executed this 11<sup>th</sup> day of February, 2021 in Redondo Beach, California.

/s/ Christina N. Goodrich

Christina N. Goodrich